

## **EXHIBIT B-155**



IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

IN RE: )  
 ) 2022-EX-000024  
SPECIAL PURPOSE GRAND JURY )  
 ) Judge Robert C. I. McBurney  
 )  
 )  
 )

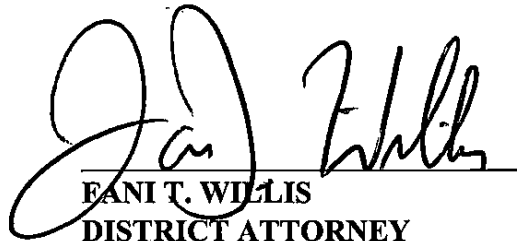
**STATE'S MODIFICATION OF ITS MOTION IN LIGHT OF TARGETED  
DEFENDANT FALSE ELECTORS HIRING INDEPENDENT, CONFLICT-  
FREE COUNSEL TO SATISFY STATE'S CONCERN REGARDING  
INTEGRITY OF THE TRIAL PROCESS.**

COMES NOW, Fulton County District Attorney Fani T. Willis, on behalf of the State of Georgia and the citizens of Fulton County, and files this modification of its Motion to Disqualify and shows this Court the following:

1. The purpose of the State's motion filed on April 18, 2023, was to protect the rights of potential defendants as well as the integrity of potential convictions,
2. Further, to address any ethical violations by Ms. Debrow that may result in appealable issues,
3. Pursuant to the State filing its motion detailing its grave concerns with Ms. Debrow's representation of clients with differing levels of criminal exposure and differing status as to offers of immunity, those potential defendants who have not been offered immunity **have hired new, conflict-free counsel and have eliminated the conflict causing the State's concern,**
4. As all of Ms. Debrow's remaining clients have accepted immunity offers from the state, her representation of multiple clients no longer creates the conflict that gave rise to the State's concern, thereby rendering the State's April 18, 2023, motion moot.

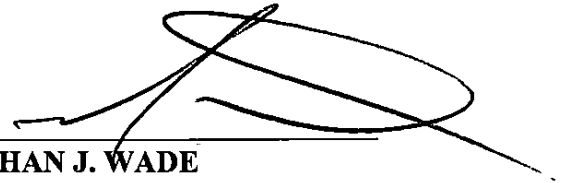
**WHEREFORE**, based on the foregoing facts, the District Attorney respectfully requests that the Court recognizes the State's April 18, 2023, motion regarding attorney Kimberly Burroughs Debrow's representation of multiple potential defendants as moot.

Respectfully submitted this 10<sup>th</sup> day of May 2023.

A handwritten signature in black ink, appearing to read "Eani T. Willis", written over a horizontal line.

**EANI T. WILLIS**  
**DISTRICT ATTORNEY**

Atlanta Judicial Circuit  
Ga. Bar No. 223955  
136 Pryor Street Southwest  
Third Floor  
Atlanta, Georgia 30303

A handwritten signature in black ink, appearing to read "Nathan J. Wade", written over a horizontal line.

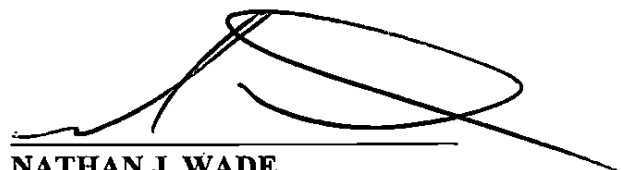
**NATHAN J. WADE**  
**SPECIAL PROSECUTOR**

Atlanta Judicial Circuit  
Ga. Bar No. 390947  
136 Pryor Street Southwest  
Third Floor  
Atlanta, Georgia 30303

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing modification of the state's motion in light of targeted defendant false electors hiring independent, conflict-free counsel to satisfy State's concern regarding integrity of the trial process will be served upon Kimberly Burroughs Debrow by electronic mail, this 10<sup>th</sup> day of May 2023.

**FANI T. WILLIS**  
**DISTRICT ATTORNEY**  
Atlanta Judicial Circuit  
Ga. Bar No. 223955  
136 Pryor Street Southwest  
Third Floor  
Atlanta, Georgia 30303



**NATHAN J. WADE**  
**SPECIAL PROSECUTOR**  
Atlanta Judicial Circuit  
Ga. Bar No. 390947  
136 Pryor Street Southwest  
Third Floor  
Atlanta, Georgia 30303